

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HACHETTE BOOK GROUP, INC.,  
HARPERCOLLINS PUBLISHERS LLC, JOHN  
WILEY & SONS, INC., and PENGUIN RANDOM  
HOUSE LLC,

Plaintiffs,

-against-

INTERNET ARCHIVE and DOES 1 through 5,  
inclusive,

Defendants.

Case No. 1:20-CV-04160-JGK

**MOTION FOR  
ADMISSION PRO  
HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Theodore M. Shapiro, hereby move this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for *amici curiae* International Publishers Association, Federation of European Publishers, International Association of Scientific, Technical and Medical Publishers, International Confederation of Societies of Authors and Composers, International Federation of Film Producers Associations, International Video Federation, and IFPI in the above-captioned action.

I am a member in good standing of the Bar of the Commonwealth of Massachusetts and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the affidavit pursuant to Local Rule 1.3.

Dated: August 8, 2022

Respectfully submitted,

/s/ Theodore M. Shapiro  
Theodore M. Shapiro

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 8, 2022, this Motion for Admission was filed through the Court's Electronic Case Filing ("ECF") system. Notice of this filing will be sent electronically to the parties as identified on the Notice of Electronic Filing ("NEF") and may be accessed through the Court's system.

/s/ Theodore M. Shapiro  
Theodore M. Shapiro

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